

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CONGHUA YAN,)
Plaintiff,)
v.) Case No. [4:23-cv-00758-P-BJ]
THE STATE BAR OF TEXAS, a private company,)
THE BARROWS FIRM, a private company,)
LESLIE STARR BARROWS, in individual capacity,)
as member of the State Bar of Texas,)
WILLIAM ALBERT PIGG in individual capacity,)
as member of the State Bar of Texas,)
SAMANTHA YBARRA, in individual capacity,)
as member of the State Bar of Texas,)
LUIS JESUS MARIN in individual capacity,)
as member of the State Bar of Texas,)
and official capacity as Assistant Disciplinary)
Counsel for the Office of the CDC,)
DANIEL EULALIO MARTINEZ)
in individual capacity,)
as a member of the State Bar of Texas,)
and official capacity as Assistant Disciplinary)
Counsel for the Office of the CDC,)
RACHEL ANN CRAIG in individual capacity,)
as member of the State Bar of Texas,)
and official capacity as Assistant Disciplinary)
Counsel for the Office of the CDC,)
LORI L. DEANGELIS in individual capacity,)
as member of the State Bar of Texas,)
and official capacity as Associated Judge,)
TARRANT COUNTY,)
Defendants.)

**MOTION FOR LEAVE TO UNFILE ECF NO 27 THEN
REFIL AMENDED ORIGINAL COMPLAINT WITH ORIGINAL EXHIBITS**

TO THE HONORABLE JUDGE OF NORTHERN DISTRICT OF TEXAS:

COMES NOW, Plaintiff, Conghua Yan, respectfully submits this Motion for Leave to unfile ECF No. 27 then refile Amended Original Complaint with original exhibits, pursuant to Federal Rules of Civil Procedure 15(a)(2).

1. On July 21st, 2023, the Plaintiff filed an original complaint against The State Bar of Texas et al, defendants. ECF No. 1. Original exhibits were attached in the same ECF document.

2. Plaintiff mistakenly had a typo, using “The Barrow Firm” as a party in the Caption, but typed the name correctly in the summon. “The Barrow Firm” as a party is misnomer.

3. The Court clerk neither spotted this typo nor asked for a correction. The summon was issued with the correct spelling as “The Barrows Firm”.

4. There are 2 more typos in the context part of the original complaint. In the rest of the pleading, “The Barrows Firm” was correctly spelled.

5. The Plaintiff requests, with the intention to correct “The Barrow Firm” to “The Barrows Firm,” that no other context in the original pleading be amended.

6. On August 25th, 2023, Plaintiff filed Motion for Leave to Amend Original Complaint, ECF No. 25.

7. On August 28th, 2023, this Court granted Plaintiff's Motion for Leave to Amend Original Complaint, ECF No. 26.

8. On August 28th, 2023, Plaintiff filed First Amended Complaint, ECF No. 27.

9. On September 1st, 2023, Plaintiff filed original exhibits as additional attachment to First Amended Complaint, ECF No. 41.

10. On September 1st, 2023, this Court ordered Plaintiff has to leave of court to file Amend Original Complaint and original exhibits in one document, ECF No. 42.

11. Based on the above, Plaintiff respectfully requests that the Court, pursuant to Federal Rules of Civil Procedure 15(a)(2), grant Plaintiff leave to unfile First Amended Complaint, ECF No. 27, then refile First Amended Complaint with original exhibits attached as one document.

Respectfully submitted,

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
/[arnold200@gmail.com]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CONGHUA YAN,)
Plaintiff,)
v.) Case No. [4:23-CV-00758]
The State Bar of Texas et al,)
Defendants.)

)

CERTIFICATE OF CONFERENCE

On September 5th, 2023, Plaintiff consulted with Ms. Amanda Kates, counsel for the Defendants. Plaintiff notified counsel of his intent to file a Motion for Leave to unfile ECF No. 27 then refile Amended Original Complaint with original exhibits. Ms. Amanda Kates has expressed her opinion to,

Opposed the Motion.
 Unopposed Motion.

On September 5th, 2023, Plaintiff consulted with Mr. Keith Ogle, counsel for the Defendant. Plaintiff notified counsel of his intent to file a Motion for Leave to unfile ECF No. 27 then refile Amended Original Complaint with original exhibits. Mr. Keith Ogle has expressed his opinion to,

Opposed the Motion.
 Unopposed Motion.

On September 5th, 2023, Plaintiff consulted with Mr. Pigg. Plaintiff notified Mr. Pigg of his intent to file a Motion for Leave to unfile ECF No. 27 then refile Amended Original Complaint with original exhibits. Mr. Pigg has expressed his opinion to,

Opposed the Motion.
 Unopposed Motion.

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
[arnold200@gmail.com]

CERTIFICATE OF SERVICE

On (September 5th, 2023) I, Conghua Yan, filed (Motion for Leave to unfile ECF No. 27 then refile Amended Original Complaint with original exhibits [ECF No. 46]) through the court CM/ECF system.

I hereby certify that I have served the forgoing document on all counsels and/or pro se parties of record in a manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Conghua Yan

Conghua Yan, Pro Se Plaintiff

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